

## **SUMMARY OF THE PROFICIENCY TESTING COMMITTEE MEETING JUNE 29, 1999**

The Proficiency Testing (PT) Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met on Tuesday, June 29, 1999, at 8:30 a.m. Eastern Daylight Time (EDT) and at 1 p.m. EDT as part of the Fifth NELAC Annual Meeting in Saratoga Springs, NY. The meeting was led by its chair, Ms. Anne Rhyne of the Texas Natural Resources Conservation Commission. A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The purpose of the meeting was to cover the agenda items as set forth by the chairperson.*

### **INTRODUCTION**

Ms. Rhyne began the meeting by asking committee members to introduce themselves. Each member gave their name and briefly described their background. Ms. Rhyne then announced that Mr. Tom Coyner and she would be rotating off the committee; Ms. RaeAnn Haynes and Dr. Larry Jackson will be the new committee members. The rules of the meeting were then described by the meeting facilitator, Dr. Bill Gutknecht. Ms. Rhyne also introduced Mr. Bob Graves of the U.S. Environmental Protection Agency (U.S. EPA) and Ms. Reenie Parris of the National Institute of Standards and Technology (NIST) who have had an integral role in the development of the PT standards.

### **SUMMARY OF FREQUENTLY ASKED QUESTIONS (FAQs)**

Ms. Barbara Burmeister presented a summary of the PT Committee's FAQs. She pointed out that one of the highlights is "Can a State Choose its PT Provider?" Ms. Burmeister said that any changes made to the chapter during this meeting will also be made, as appropriate, in the FAQs. The FAQs are available from the NELAC Website.

### **CHAPTER 2, SECTION 2.0**

Ms. Rhyne began discussion of Section 2.0 by informing participants of a related discussion which took place on June 28, 1999 in the Transition Committee meeting. As a result, the committee's proposed language (which was included in participants' registration materials) was revised. The reason for revision was that some Accrediting Authorities did not feel comfortable receiving samples from a NIST applicant. Ms. Rhyne proposed language for Section 2.0; however, several participants raised issue with the proposal. As a result, discussion ensued and several alternate versions of Section 2.0 were considered.

Some points of discussion were:

- NELAC will have an incomplete PT program at its start and therefore, the committee will have to go with the most comprehensive program it can get.
- One version of the proposed language put a burden on providers of having to deal with two PT accreditors: Proficiency Testing Oversight Board(PTOB/Proficiency Test

Provider Accreditor (PTPA). This is the kind of burden the committee has been trying to eliminate for the laboratories.

- There was a request to include a cutoff date so that laboratories do not try to use old data (e.g., 2-3 years old) for PT applications. Ms. Rhyne replied that according to the Transition Committee, setting a date for PT data is a policy decision and should not be included in the standards. If a date is to be set, the Transition Committee will be responsible for doing so, with a recommendation from the PT Committee. Another participant commented that he was opposed to the inclusion of a drop-dead date in the standards.
- If non-accredited PT providers are allowed to distribute samples under NELAC, then data that ends up in court may be challenged for not meeting NELAC standards. The commentator pointed out that the laboratories' clients have not been included in this discussion and asked that the end-users be considered in this decision. Another commentator agreed that this puts laboratories at risk. Laboratories are put in the position of saying that they have good data, but there is no assurance that the providers have good samples, without provider accreditation for those samples.
- Reciprocity was pointed out as a key consideration.
- The current standards require two approved PT samples before a laboratory can become accredited. A committee member pointed out that if a particular PT program is not available, then the laboratory can still be accredited without PT samples. The assessors would have to rely on the on-site assessment and quality systems.
- A commentator said that trust between accrediting authorities is necessary. As long as the Accrediting Authorities (AA) approve of a PT Provider, then another AA should accept that PT data.
- It was asked whether it is considered a conflict of interest for an accrediting authority to produce and authorize its own PT results. The commentator requested that the issue be brought up to the Environmental Laboratory Advisory Board (ELAB), to avoid a potential conflict of interest. He also suggested that the committee put into standards that "conflict of interest is waived in the case of an accrediting authority that produces and authorizes its own PT samples."
- It was asked whether there was a connection between the wording in Section 2.2.4, "NELAP-approved PT Provider," and the wording in the proposed language for Section 2.0, "NIST/NVLAP-accredited PT Provider" (i.e., is it the same thing)? The committee agreed to use the following wording consistently in the chapter: "NELAP-designated PTOB/PTPA-approved PT Provider."

The following wording for Section 2.0 was accepted by the majority of participants, and by the PT Committee, and will be presented for vote on June 30, 1999:

"Until such time as the National Institute of Standards and Technology (NIST) has accredited PT Providers, laboratories shall obtain PT samples for purposes of NELAC accreditation, from a PT Provider that has submitted application to NIST

for approval and that has submitted to the laboratory written attestation that it complies with NIST Handbook 150, NIST Handbook 150-19, and EPA's National Standards for Water Proficiency Testing Criteria Document (dated December 1998 or later). Following implementation of the NIST National Voluntary Laboratory Accreditation Program (NVLAP) for Providers of Proficiency Testing, and before a Proficiency Test Provider distributes PT samples to laboratories for the purpose of the laboratories obtaining or maintaining NELAP accreditation, the provider shall first obtain NVLAP accreditation for all compounds/matrices for which NIST accreditation is available, and for which the provider intends to provide NELAC PT samples."

For all other programs and compounds for which NIST/NVLAP accreditation is not available, a provider of PT samples for NELAC accreditation must be accredited by an American National Standards Institute/Registrar Accreditation Board (ANSI/RAB)-accredited registrar or equivalent Proficiency Test Provider Accreditor (PTPA) or provided evidence to the laboratory of applying to an ANSI/RAB-accredited registrar or equivalent PTOB/PTPA for the compounds/matrices offered. The PT Provider must also produce samples for these matrices that comply with all criteria published by the NELAC Standing Committee on Proficiency Testing.

For fields of testing for which PT samples are not available from either a NELAP PTOB/PTPA (e.g., NIST) or an ANSI/RAB-accredited registrar or equivalent PT Provider, a Primary Accrediting Authority may accept PT results from non-accredited PT Providers. In these cases, the Secondary Accrediting Authority shall accept the decision of the Primary Accrediting Authority."

## **SECTIONS 2.1 - 2.5**

The changes in Sections 2.1 through 2.5 were presented. The following additional changes were agreed upon:

- In Section 2.1.1.d, "i.e." will be changed to "e.g." because the program is not limited to drinking water and waste water.
- In the first sentence of Section 2.3.1, "NELAP-approved" will be deleted, because it is unnecessary.
- "Prepared value" will be changed to "assigned value" throughout the chapter. Also, the definition of "assigned value" will be added to the NELAC glossary.

## **SECTIONS 2.5 - 2.7**

In Section 2.6, it was pointed out that the current wording precludes release of data, at the client's request, to other parties. In order to allow disclosure, the last sentence will be modified as follows: "The PT Providers shall not disclose specific laboratory results or evaluations to any other parties without the written release of the laboratory."

In Section 2.7.5 language was added to describe the process for handling questionable PT samples. It was pointed out that the new text applies to any study, not just the second failed study. Therefore, it will be moved to a new Section 2.7.8, entitled “Process for Handling Questionable PT Samples.”

Regarding filing complaints against a PT Provider, a commentor requested the addition of language such as: “When the Accrediting Authority is the PT Provider, the laboratory may appeal directly to the Accrediting Authority Review Board. (AARB)” Ms. Rhyne said that she would rather not make such an addition without first discussing it in depth with NIST. It was commented that there may be a potential for conflict of interest. Someone responded that the laboratory has recourse through the NIST complaints process. However, it was also pointed out that this does not stop the clock on the accreditation process. No such language will be added at this time.

It was pointed out that Section 2.7.5 establishes a mandatory time line of 60 days for the Accrediting Authority to take action. The commentor said that the PT Committee does not have the authority to establish requirements for another chapter. Ms. Rhyne will discuss this issue with the chairs of Chapters 4 and 6, and make a determination.

## **APPENDIX A**

A participant pointed out that there are no time constraints for the written complaints described in Section A.8.0. He recommended the addition of a one-week required time frame. Ms. Parris responded by saying that NIST did not want time requirements in the NELAC standards because they might interfere with NIST’s own designated schedules; those kinds of time frames had been previously removed from the chapter. However, the committee agreed that this was a valid request. Mr. Coyner recommended a time frame of 30 days rather than a week. Upon agreement, the first sentence now reads: “Written complaints received by the PT Provider regarding technical or procedural aspects of the studies they conduct shall be submitted to the PTOB/PTPA within 30 calendar days of receiving the complaint.”

It was requested that the last sentence of A.9.2 be changed from “NVLAP accreditation” to “PTOB/PTPA approval” to be consistent with other sections. The committee agreed with this change.

## **APPENDIX B**

A participant commented that Section B.1.2 does not address matrices at all. He requested that Section B.1.2 specifically state the “analytes in water” or “analytes and matrices covered by...” He also said that the appendix is written in very general terms, but the standards apply to only to water matrices. It was proposed to change the title to “PT Sample Composition for Water Matrices.” This was agreed upon.

Mr. Matt Caruso pointed out that inclusion of solid and hazardous waste matrices depend upon Appendix B remaining generic.

## **APPENDIX C**

In C.1.1.1, the last sentence of the paragraph, as well as the bulleted material, is merely for example. The committee agreed to delete this text from the section.

The title of C.1.1.1 will be changed from “Analytes with USEPA Established Acceptance Limits” to “Drinking Water, Waste Water, and Ambient Water Analytes with USEPA Established Acceptance Limits.”

A participant asked that an example be added to C.4.1 for clarification. The commentor wanted to know how the 10 sets of 20 data points was arrived at (as opposed to the set of 6 accepted by ASTM). A committee member explained that the requirements were supposed to be the equivalent of EPA’s guidance used to evaluate their regression equations. This issue was tabled for discussion at a later date.

## **APPENDIX D**

No written comments were received on Appendix D. Only minor editorial changes were made.

## **APPENDIX E**

Only one written comment was received on Appendix E. In Section E.1.1, the words “as presented or after reconstitution” were added for clarity.

## **APPENDIX F**

Appendix F is being presented for vote for the first time. Dr. Faust Parker reviewed a few changes made to the proposed document since it was posted on the NELAC Website in May, 1999. Section 4.2.2.b was modified slightly to word it in a manner consistent with the rest of the chapter. Table F.4.1 will be replaced with the following sentence: “Method codes will reflect the EPA DMR-QA study codes for the current year.” The initial approach in Appendix F for WET testing is to “walk softly.” The appendix will begin with what was historically run for DMR-QA.

## **APPENDIX G**

A copy of the current Appendix G was distributed to meeting participants. Mr. Chuck Wibby said that there are three main changes for Appendix G (not to be presented for vote). First, Appendix G was modified to be consistent with other appendices by only including those things that were specific for radiochemistry PT studies. He said that the appendix addresses safe drinking water applications only (not solid waste or hazardous waste). Second, the appendix was made consistent with EPA’s National Standards for Water Proficiency Testing Criteria Document. Third, text describing sample designs, concentration ranges, scoring criteria, and study schedules were removed from the appendix (they had been included for information only, and were not necessary within the standards).

## **APPENDIX H**

Ms. Autry provided an update on Appendix H (not to be presented for vote). A copy of the current draft was distributed at the meeting. She said that it had been modeled after Appendix C. Several modifications will need to be made similar to the proposed changes within the rest of the chapter.

The starting point for this appendix is field air measurements. Ms. Autry said that the laboratory portion still needs to be addressed internally by EPA before being included. Also, the appendix only includes ambient air at this time. It is general to begin with; more detail will need to be added. Ms. Autry said that she is interested in receiving comments.

## **SOLID WASTE**

A list of analytes for solid PT samples was handed out to participants. In response to question, Mr. Caruso said that all the analytes are from spiked materials. Another commentor said that their laboratory will be required to be NELAC certified for hazardous waste. The commentor wanted to know whether this was possible, if PT samples were unavailable. Mr. Caruso responded that if PT samples are not available from anyone, the laboratory can still become accredited. He also said that the list of analytes will grow as data becomes available.

## **EPA/NIST ACTIVITIES**

Ms. Parris described NIST's role and provided an update of activities including the on-site audits currently in process. Right now, there are five applicants that have deficiencies in their quality systems (QS); once their documentation for QS is complete, the on-site assessments will be scheduled. The end of August will be the stopping point for the first class of providers. Accreditations will be made by the end of October.

## **MISCELLANEOUS**

Ms. Burmeister presented Mr. Coyner and Ms. Rhyne certificates of appreciation for their outstanding service on the PT Committee.

**ACTION ITEMS  
PROFICIENCY TESTING COMMITTEE MEETING  
JUNE 29, 1999**

<b>Item No.</b>	<b>Action</b>	<b>Date to be Completed</b>
1.	Coordinate with Chapters 4 and 6 regarding Section 2.7.5 which requires the Accrediting Authority “to take action, pursuant to Chapter 4, within 60 calendar days to determine the accreditation status...”	ASAP

**PARTICIPANTS  
PROFICIENCY TESTING COMMITTEE MEETING  
JUNE 29, 1999**

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